

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

REBECCA KLYMN,

Plaintiff,

vs.

21-CV-6488-JLS-LGF

PLAINTIFF'S FIRST REQUEST
FOR PRODUCTION OF
DOCUMENTS TO DEFENDANT
MARGARET ALLEN

MATTHEW ROSENBAUM, ET AL.,
Defendants.

To: Letitia James, Attorney General
Heather McKay, Esq., of Counsel
Attorneys for Defendants Grant,
Pawelczak, Taddeo, Grimald,
Allen, and Fields.

Plaintiff, REBECCA J. KLYMN, pursuant to Fed. R. Civ. P. 34, propounds the following Requests for Production of Documents upon the Defendant MARGARET ALLEN (Referred to herein as "Defendant" or "Defendants"), to be answered within thirty (30) days. These Document Requests must be answered fully, separately, in writing, and under oath. Each answer must be preceded by the question to which it responds.

Where a designated Document Request includes subparagraphs, each is to be answered separately, organized in such a manner as to identify the request to which each Document is responsive. Pursuant to Local Rule of Practice 26(b) an electronic courtesy copy of these Interrogatories in Word format will be emailed to counsel. Please ensure that all responses are made on behalf of all Defendants, unless you specify that a particular response concerns fewer than all Defendants in which case please specify to which Defendant(s) it applies.

The definitions and instructions contained in Local Rule of Practice 26(c)(3) and

26(c)(4), attached hereto, are hereby incorporated into and made a part of each Document Request that follows, and must be strictly followed.

Defendant is further requested to provide Plaintiff with a list of any Documents withheld under a claim of privilege, providing the date, author, title and addresses of the Document, the identity of any person or entity to whom the Document has been supplied, a description of the subject matter of the Document, and the basis for the assertion of a privilege, pursuant to the procedures set forth in Local Rule of Practice 26(d)(1) and (2).

If an answer to these Document Requests, read literally, requires the production of a part or portion of a document, production of the entire document is requested.

If any document requested herein was at one time in existence, but has been lost, discarded or destroyed, identify each document as completely as possible, and state the type of document, the date or approximate date it was lost, discarded or destroyed, the circumstances and manner in which it was lost, discarded or destroyed, the reason or reasons for disposing of the document, and the identity of persons having knowledge of its content.

The procedures set forth in Local Rule of Practice 26(e) governing discovery of electronically stored information are also hereby incorporated by reference.

In answering these Document Requests, the Defendant is requested to furnish all information, including hearsay, in possession of the Defendants and their attorneys, agents, investigators, employees, independent contractors, and all other persons acting on behalf of the Defendants, and not merely such information known of the personal knowledge of the person answering these interrogatories.

The Document Requests which follow are to be considered as continuing to the extent permitted by Rule 26(e) of the Federal Rules of Civil Procedure, and you are requested to

provide, by way of supplementary answers, such additional information as you or any other person acting on your behalf may hereafter obtain which will augment or otherwise modify your answers now given to the Document Requests below. Such supplementary responses are to be served upon plaintiff within 30 days after receipt of such information.

The failure to comply with any of the said instructions and procedures will constitute the basis for an objection to the response to these Interrogatories.

DOCUMENT REQUESTS

Please produce the following documents:

1. All documents and communications concerning Rebecca Klymn's complaints about the conduct of Justice Matthew Rosenbaum alleged in the Second Amended Complaint in this matter that were received, created, and/or maintained by Defendant from 2005 to the present.

PLEASE TAKE NOTICE THAT the Plaintiff will object to the introduction at trial of any Document which is not produced in response to the foregoing requests and to any evidence about any requested document which has not been revealed by an appropriate response to this Request for Production of Documents.

DATED:

Buffalo, New York

LINDY KORN, ESQ.
The Law Office of Lindy Korn, LLP
535 Washington Street, Ninth Floor
Buffalo, NY 14203
716-856-5676
lkorn@korn-law.com

ANNA MARIE RICHMOND, ESQ.
2500 Rand Building
14 Lafayette Square
Buffalo, NY 14203
716-854-1100
annamarierichmondessq@gmail.com